

November 25, 2009
via electronic filing

Ms. Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: SEIU COPE Amended 30 Day Post-General Report (10/16/08-11/24/08), received 8/24/09

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated October 28, 2009 which asked about two items.

First, you requested additional information about the \$100,000 misdeposit included in the above-referenced report. As noted in your letter, our amended Year-End Report (11/25/08 - 12/31/08) shows that once the inadvertent deposit error was identified, the amount misdeposited was promptly returned on 12/18/08 to the account originally intended.

Second, you requested information about additional receipts disclosed on the amended report that were not included on the original report. During this period, we modified the way we use the reporting software by coding each disbursement as ""cash"" or ""estimate"" to help distinguish the regular disbursement entries for the FEC Form3x periodic reports from the estimated entries needed to be in the database for inclusion on 24 or 48 hour notices. An unforeseen consequence of this change was that certain receipts entered into our reporting database were not coded as cash and were therefore skipped by the software when the Form3x report was prepared. The period in question included receipts from parts of two different calendar months and ended in mid-month. As a result, the normal procedure of comparing the report totals to the reconciled bank balance was not available, and the error was not detected when the report was filed.

Please feel free to contact me if you have any further questions

Sincerely,

Mark Schneider
Counsel For SEIU COPE
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